

ADAM R.F. GUSTAFSON
Acting Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

DANIEL C. LUECKE (CA Bar No. 326695)
Trial Attorney, Natural Resources Section
Ben Franklin Station, P.O. Box 7611
Washington, D.C. 20044-7611
Telephone: (202) 598-7863
Email: daniel.luecke@usdoj.gov

Counsel for Federal Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY; WISHTOYO
FOUNDATION,

Plaintiff,

v.

DOUG BURGUM, et al.,

Federal Defendants,

SABLE OFFSHORE CORP.,

Intervenor-Defendants.

Case No. 2:24-cv-05459

**SUPPLEMENTAL
DECLARATION OF BRUCE
HESSON**

1. My name is Bruce Hesson and I am the Regional Director of the Bureau of Safety and Environmental Enforcement ("BSEE") for the Pacific Region. I have been employed

with BSEE since 2016, serving first as Supervisor of the Compliance Section, until my appointment to Regional Director in August 2022. I am incorporating my previous declaration on December 18, 2024, into this Supplemental Declaration.

2. The purpose of this supplemental declaration is to provide additional information regarding BSEE's review of the 2023 lease extension decision. BSEE has requested the Bureau of Ocean Energy Management ("BOEM") to support this review by preparing an Environment Assessment ("EA") to evaluate the potential environmental impacts of the lease extension, which may lead to the Santa Ynez Unit's ("SYU") return to production. BSEE and BOEM have already commenced working on the EA and anticipate that the EA will be completed in the next few months.
3. The EA will examine the potential environmental impacts of the lease extensions and concerns raised by the plaintiffs, including those related to air quality, oil spill risk, and protected species and areas. The EA will also include a cumulative effects analysis of resuming oil and gas production from SYU.
4. In addition to preparing an EA, BSEE will revisit its analysis regarding the national interest determination, as described in my previous declaration submitted in this case.
5. I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing information is true, accurate, and complete.

Executed this 7th day of March 2025.



Bruce H. Hesson